



Chairperson: Bob Wyatt, NW Natural
Treasurer: Fred Wolf, Legacy Site Services for Arkema

July 24, 2009

Chip Humphrey
Eric Blischke
U.S. Environmental Protection Agency, Region 10
805 SW Broadway, Suite 500
Portland, OR 97205

**Re: Revised Remedial Action Objectives (RAOs) and Management Goals (Lower
Willamette River, Portland Harbor Superfund Site, USEPA Docket No: CERCLA-
10-2001-0240)**

Chip and Eric:

The LWG has reviewed EPA's latest comments on the revised RAOs and Management Goals text provided via email attachment dated July 2, 2009. Attached is revised RAOs and Management Goals text in the form of a proposed RAOs section of the future Feasibility Study (FS). This version includes many of EPA's previous revisions to the RAOs, but also includes alternate text that the LWG believes is the most technically and legally accurate way to word the RAOs. We have included narrative comments within the text that describe the technical and legal reasons for this alternate text.

We understand based on discussions to date that EPA disagrees with some of the LWG's alternate wording. However, the LWG believes it is necessary to go on record regarding the RAO text that we consider to be the most legally and technically accurate.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Wyatt", is written over a light blue horizontal line.

Bob Wyatt

cc: Confederated Tribes and Bands of the Yakama Nation
 Confederated Tribes of the Grand Ronde Community of Oregon
 Confederated Tribes of Siletz Indians of Oregon
 Confederated Tribes of the Umatilla Indian Reservation
 Confederated Tribes of the Warm Springs Reservation of Oregon

Nez Perce Tribe
Oregon Department of Fish & Wildlife
United States Fish & Wildlife
Oregon Department of Environmental Quality
LWG Legal
LWG Repository